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MEMORANDUM

TO: Ralph Dollhopf, On-Scene Coordinator
United States Environmental Protection Agency
9311 Groh Road, Room 316
Grosse Isle, Michigan 48138-1697

Deborah Orr, Remedial Project Manager
United States Environmental Protection Agency
77 W. Jackson Boulevard (SE-4J)
Chicago, Illinois 60606-3590

FROM: Scott Lockhart, P.E. 
Project Manager

DATE: December 3, 1998

RE: Toledo Tie Treatment Site, Monthly Project Report
KMC001.100.0017

The following summary is prepared pursuant to Section V, Item 3.5, of the Unilateral Administrative Order (UAO) issued to Kerr McGee Chemical, LLC (KMC) on December 24, 1997.

WORK PERIOD:

November 1, 1998 to November 30, 1998

SIGNIFICANT DEVELOPMENTS:

1. excavation of the suspected lagoon area west of the distribution warehouse began on November 2, 1998, with the stripping of surficial soils. Approximately 5,950 tons of material have been shipped off-site to Peoria Disposal
2. Midwest Dewatering continued installation of the Williams Ditch by-pass piping
3. IT Group constructed an additional clay dam at the downstream sediment removal limit as part of the ditch by-pass system
4. sediment excavation began in Williams Ditch immediately east of Arco Drive
5. dry, unknown material was encountered above source areas during preparation of excavation work areas. This material was stockpiled on-site and analytical samples collected
6. the waterline was capped outside the excavation area and valves installed per the Work Plan. The work was performed by Geo Gradel Company

7. storm sewers along Arco Drive and on Frenchmens Road north of the distribution warehouse were cleaned and videotaped
8. ambient air sampling was conducted in the work area and at the perimeter of the site
9. U.S. EPA comments on KMC's October 8, 1998 submittal were received on the EE/CA SSP

PROBLEMS:

1. three odor complaints were received by the City of Toledo. The Ohio Department of Health (ODH) was contacted to review air monitoring data and site conditions. Action levels for benzene and naphthalene were established. Communication to the City of the air sampling results and the ODH information is pending
2. after the initial cleaning of the first section of Williams Ditch, sheen and a dark fluid were observed flowing eastward from the 48 inch culverts under Arco Drive. The source of this discharge was unknown. The problem was resolved by cleaning and videotaping storm sewers along Arco Drive south of Frenchmens Road. Repair or replacement options of the sewers are being pursued

ANALYTICAL DATA:

1. ambient air sampling data for November are attached.
2. analytical data for the water treatment system were provided under separate cover as a carbon copy to Ohio EPA
3. analytical data for the dry unknown material are attached

CORRESPONDENCE:

1. monthly report dated November 14 ,1998, for October, 1998, activities was forwarded to US EPA
2. weekly reports from KMC to US EPA documenting product recovery and site inspection activities. Reports were dated November 5, 12, 20, and 25, 1998
3. water treatment system analytical data were forwarded to Ohio EPA (carbon copy to US EPA)
4. copies of Manifests from Peoria Disposal Company were forwarded to Ecology & Environment
5. comments from the U.S. EPA on the October 8, 1998, EE/CA SSP submittal were received via facsimile at close of business on November 23, 1998
6. electronic communication on November 24, 1998, with U.S .EPA confirming receipt of the comments and deadline for re-submittal of EE/CA SSP

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ANTICIPATED ACTIVITIES NEXT PERIOD:

1. initiation of sediment removal from Williams Ditch
2. continued weekly product recovery until by-pass work and sewer sliplining is completed
3. continued ambient air monitoring and sampling
4. continued excavation of source material in lagoon areas. It is likely that some road removal activities will occur in December, 1998

ct: A. Keith Watson, Project Manager, Kerr-McGee
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*Michael
McElroy*

12/7/98

**KERR-MCGEE CHEMICAL, LLC
TOLEDO TIE TREATMENT SITE
TIME CRITICAL REMOVAL
HULL & ASSOCIATES, INC. AIR SAMPLING RESULTS**

Date:	Sample I.D.:	Sample Location:	Analysis Conducted:	Results(ppm):	Average Flow Rate Q(L/min):	Duration (min):	Volume (L):
11/03/98	KMC-BN-110398-001	Personal	Benzene/ Naphthalene	<0.0011/ 0.00072	0.9137	303	276.85
11/03/98	KMC-BN-110398-002	Upwind Perimeter of Excavation	Benzene/ Naphthalene	<0.00079/ <0.00048	0.9067	438	397.13
11/03/98	KMC-BN-110398-003	Downwind Perimeter	Benzene/ Naphthalene	0.0017/ 0.002	0.9237	454	419.36
11/03/98	KMC-BN-110398-004	Field Blank	Benzene/ Naphthalene	<1/ <1	N/A	N/A	N/A
11/04/98	KMC-BN-110498-006	Personal	Benzene/ Naphthalene	0.0016/ 0.0045	0.9154	438	400.95
11/04/98	KMC-BN-110498-007	Upwind Perimeter of Excavation	Benzene/ Naphthalene	0.0038/ 0.0057	0.9125	480	438.00
11/04/98	KMC-BN-110498-008	Downwind Perimeter	Benzene/ Naphthalene	<0.0072/ <0.00044	0.9102	480	436.90
11/04/98	KMC-BN-110498-009	Field Blank	Benzene/ Naphthalene	<1/ <1	N/A	N/A	N/A
11/23/98	KMC001-112398-010-T388	Downwind Perimeter of Excavation	Benzene/ Naphthalene	<0.00076/ 0.027	0.8904	465	414.04
11/23/98	KMC001-112398-011-T388	Upwind Perimeter	Benzene/ Naphthalene	<0.00073/ <0.00045	0.9166	467	428.05
11/23/98	KMC001-112398-012-T388	Field Blank	Benzene/ Naphthalene	<1/ <1	N/A	N/A	N/A

**KERR-MCGEE CHEMICAL, LLC
TOLEDO TIE TREATMENT SITE
TIME CRITICAL REMOVAL
HULL & ASSOCIATES, INC. AIR SAMPLING RESULTS (cont.)**

Date:	Sample I.D.:	Sample Location:	Analysis Conducted:	Results(ppm):	Average Flow Rate Q(L/min):	Duration (min):	Volume (L):
12/02/98	KMC001-120298-001-T388	Upwind Perimeter	Benzene/ Naphthalene	<0.038/ <0.023	≈ 0.016/ (OVB) 0.0122	514	≈ 8.22/ 6.27
12/02/98	KMC001-120298-002-T388	Downwind Perimeter	Benzene/ Naphthalene	<0.038/ <0.023	≈ 0.016/ (OVB) 0.0122	512	≈ 8.19/ 6.25
12/02/98	KMC001-120298-003-T388	Downwind Perimeter	Benzene/ Naphthalene	<0.038/ <0.023	≈ 0.016/ (OVB) 0.0122	511	≈ 8.18/ 6.23
12/02/98	KMC001-120298-004-T388	Field Blank	Benzene/ Naphthalene	<1.0/ <1.0	N/A (OVB)	N/A	N/A

OVB - Organic Vapor Badge

≈ - Each gas or vapor has a specific diffusion coefficient that can be used with the sampler geometry to determine a theoretical sampling rate.

**KERR-MCGEE CHEMICAL, LLC
TOLEDO TIE TREATMENT SITE
TIME CRITICAL REMOVAL
OHM/IT CORPORATION AIR SAMPLING RESULTS (cont.)**

Date:	Sample I.D.:	Sample Location:	Analysis Conducted:	Results(ppm):	Average Flow Rate Q(L/min):	Duration (min):	Volume (L):
11/02/98	BN-110298-01	Downwind Perimeter	Benzene/ Naphthalene	<0.017/ <0.032	0.831	434	360.44
11/02/98	BN-110298-02	Downwind Perimeter	Benzene/ Naphthalene	<0.018/ <0.033	0.805	434	349.37
11/02/98	BN-110298-03	Upwind Perimeter	Benzene/ Naphthalene	Defective Sample*	N/A	N/A	N/A
11/02/98	BN-110298-04	Field Blank	Benzene/ Naphthalene	<0.020/ <0.060	N/A	N/A	N/A
11/02/98	BN-110298-05	Personal	Benzene/ Naphthalene	<0.047/ <0.085	0.727	185	134.46
11/03/98	BN-110398-01	Personal	Benzene/ Naphthalene	<0.018/ <0.033	0.799	437	348.92
11/03/98	BN-110398-02	Downwind Perimeter	Benzene/ Naphthalene	<0.019/ <0.035	0.801	413	330.94
11/03/98	BN-110398-03	Personal	Benzene/ Naphthalene	<0.024/ <0.043	0.739	357	263.98
11/03/98	BN-110398-04	Downwind Perimeter	Benzene/ Naphthalene	<0.020/ <0.037	0.759	413	313.41
11/03/98	BN-110398-05	Upwind Perimeter	Benzene/ Naphthalene	<0.020/ <0.037	0.745	419	312.35
11/04/98	BN-110498-01	Personal Truck Decon	Benzene/ Naphthalene	<0.017/ <0.031	0.847	437	370.25
11/04/98	BN-110498-02	Personal Excavator Operator	Benzene/ Naphthalene	<0.019/ 0.157	0.779	413	321.81
11/04/98	BN-110498-03	Area Ameritech Workers	Benzene/ Naphthalene	<0.027/ <0.050	0.879	259	227.70

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TOLEDO TIE TREATMENT SITE
TIME CRITICAL REMOVAL
OHM/IT CORPORATION AIR SAMPLING RESULTS (cont.)**

Date:	Sample I.D.:	Sample Location:	Analysis Conducted:	Results(ppm):	Average Flow Rate Q(L/min):	Duration (min):	Volume (L):
11/04/98	BN-110498-04	Downwind Perimeter	Benzene/ Naphthalene	<0.015/ <0.032	0.982	413	405.56
11/04/98	BN-110498-05	Downwind Perimeter	Benzene/ Naphthalene	<0.018/ <0.032	0.844	419	353.63
11/04/98	BN-110498-06	Upwind Perimeter	Benzene/ Naphthalene	<0.015/ <0.027	0.844	419	353.63
11/05/98	BN-110598-01	Personal Operator	Benzene/ Naphthalene	<0.019/ <0.036	0.810	397	321.49
11/05/98	BN-110598-02	Personal Operator	Benzene/ Naphthalene	<0.017/ <0.031	0.879	423	371.90
11/05/98	BN-110598-03	Upwind Perimeter	Benzene/ Naphthalene	<0.017/ <0.032	0.909	396	359.92
11/05/98	BN-110598-04	Downwind Perimeter	Benzene/ Naphthalene	<0.015/ <0.028	1.002	415	415.91
11/06/98	BN-110698-01	Personal	Benzene/ Naphthalene	Defective Sample*	N/A	N/A	N/A
11/06/98	BN-110698-02	Area Gradel Workers	Benzene/ Naphthalene	<0.013/ <0.023	0.920	544	500.34
11/09/98	BN-110998-01	Perimeter Downwind	Benzene/ Naphthalene	<0.017/ <0.031	0.797	144	371.90 114.77 GDC
11/10/98	BN-111098-01	Perimeter	Benzene/ Naphthalene	Defective Sample*	N/A	N/A	N/A

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TOLEDO TIE TREATMENT SITE
TIME CRITICAL REMOVAL
OHM/IT CORPORATION AIR SAMPLING RESULTS (cont.)**

Date:	Sample I.D.:	Sample Location:	Analysis Conducted:	Results(ppm):	Average Flow Rate Q(L/min):	Duration (min):	Volume (L):
11/10/98	BN-111098-02	Perimeter	Benzene/ Naphthalene	Defective Sample*	N/A	N/A	N/A
11/10/98	BN-111098-03	Personal Operator	Benzene/ Naphthalene	<0.021/ <0.039	0.994	295	293.23
11/10/98	BN-111098-04	Field Blank	Benzene/ Naphthalene	<0.020/ <0.060	N/A	N/A	N/A
11/17/98	BN-111798-01	Area MPW Workers	Benzene/ Naphthalene	<0.051/ <0.093	0.929	133	123.62
11/17/98	BN-111798-02	Downwind Perimeter	Benzene/ Naphthalene	<0.015/ <0.027	0.979	426	417.22
11/23/98	BN-112398-01	Downwind Perimeter of Excavation	Benzene/ Naphthalene	<0.018/ 0.0652	0.990	349	345.34
11/23/98	BN-112398-02	Field Blank	Benzene/ Naphthalene	<0.020/ <0.060	N/A	N/A	N/A

* Defective samples may have resulted from changing weather conditions, invalid sampling time, sample breakage, or the like.